



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 25, 2020

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **United States v. Michael Hild,**  
19 Cr. 602 (RA)

Dear Judge Abrams:

The Government and counsel for defendant Michael Hild jointly and respectfully write in advance of the April 12, 2021 trial in this matter to propose an agreed-upon schedule governing pre-trial matters. The parties respectfully request that the Court adopt the following proposed schedule:

1. Pre-trial motions due by November 16, 2020;
2. Responses to pre-trial motions due by December 4, 2020;
3. Replies to pre-trial motions due by December 11, 2020;
4. Expert disclosure by all parties and defense notice of any advice of counsel defense or intent to rely on privileged material due by February 15, 2021;
5. The Government's 404(b) notice due by March 1, 2021;
6. The Government's witness list and exhibit list due by March 8, 2021;
7. Motions *in limine*, requests to charge, and voir dire due by March 11, 2021 (previously set by the Court);
8. The Court notes that the Government intends to voluntarily produce *Giglio* and 3500 material by March 15, 2021, subject to an agreement in principle to reasonable authenticity and/or business records stipulations;

